



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

March 1, 1995

Steven L. Costa
Project Manager
CH2M Hill
P.O. Box 12681
Oakland, CA 94604-2681

Re: American Samoa Canneries' Effluent Chemistry Testing

Dear Steve:

We have reviewed the February 1994 results of the priority pollutant analyses for the canneries' effluents, as required by their respective NPDES permits, as well as their requests of February 2, 1995, to reduce the scope of these biannual tests. Based on our review of the four priority pollutant analyses conducted under the present permits, metals analyses collected under the previous permits, and results of the American Samoa Environmental Protection Agency's toxicity study of Pago Pago Harbor, we agree that the scope of these tests can be reduced as indicated below. However, we will require a complete effluent priority pollutant scan to be conducted for each cannery when they apply for permit renewals. The tests can be reduced as follows:

1. Delete the tests for cyanide, pesticides and PCBs, as these constituents have not been detected in the scans and there is no reason to believe the cannery effluents will normally contain these constituents.
2. Eliminate the tests for VOCs. We agree with your assessment that laboratory contamination may have been the reason acetone was detected and that the levels of constituents detected (xylene, toluene and bromoform) are not significant. Also, under normal circumstances, VOC loadings are not expected in cannery effluent and only small quantities of VOC's have only been sporadically detected to date.
3. Continue testing for the following metals: arsenic, cadmium, chromium, copper, lead, mercury, selenium, silver and zinc. Eliminate testing for other metals as they were not detected in the four scans.

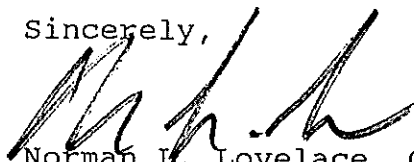
Although chromium, mercury and lead have either not been detected in the four priority pollutant scans conducted or they were detected in very low quantities, some traces of these constituents have been detected in past effluent monitoring tests. Thus we are requiring continued monitoring for these metals and source studies for those metals found in

high concentrations, such as zinc, as triggered under the NPDES permit.

Our Quality Assurance Management Section is reviewing your February 8, 1995 response to our comments regarding the priority pollutant reports of October 1993 and February 1994. Any significant comments impacting the analyses you will be conducting in mid-March will be forwarded to you as soon as their review is completed.

Please call Pat Young at 415/744-1594 if you have any questions regarding the above.

Sincerely,



Norman E. Lovelace, Chief
Office of Pacific Island and Native
American Programs (E-4)

cc: Jim Cox, Van Camp Seafood Company, Inc.
Norman Wei, StarKist Seafood Company
Michael Macready, VCS Samoa Packing Company
Barry Mills, StarKist Samoa, Inc.
Tony Tausaga, American Samoa EPA
Sheila Wiegman, American Samoa EPA